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8 UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING YELLOWSTONE
9 NATIONAL PARK

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11 UNITED STATES OF AMERICA,)

Cause No. 2:11M2105-001

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Plaintiff,

MOTION TO STAY SENTENCE

vs.

JACK KANE PARRENT JR.,)

Defendant

COMES NOW, Jami Rebsom, attorney for the above-named defendant, and moves
the Court for an staying his sentence pending appeal in this matter.

ARGUMENT

Rule 38. Stay of Execution, and Relief Pending Review allows the court to stay Mr.
Parrent's sentence pursuant to the following rule.

Rule 38(a) Stay of Execution(2) Imprisonment. A sentence of imprisonment shall be
stayed if an appeal is taken and the defendant is released pending disposition of appeal pursuant to
Rule 9(b) of the Federal Rules of Appellate Procedure. If not stayed, the court may recommend to
the Attorney General that the defendant be retained at, or transferred to, a place of confinement near

the place of trial or the place where an appeal is to be heard, for a period reasonably necessary to permit the defendant to assist in the preparation of an appeal to the court of appeals. (3) Fine. A sentence to pay a fine or a fine and costs, if an appeal is taken, may be stayed by the district court or by the court of appeals upon such terms as the court deems proper. The court may require the defendant pending appeal to deposit the whole or any part of the fine and costs in the registry of the district court, or to give bond for the payment thereof, or to submit to an examination of assets, and it may make any appropriate order to restrain the defendant from dissipating such defendant's assets.

Mr. Parrent has been on pre-trial probation supervision and has not had any violations. Therefore, Mr. Parrent requests the Court stay the sentence pending an appeal in this case.

DATED this 31 January day of December, 2012.

By JAMI REBSOM

CERTIFICATE OF SERVICE

I hereby certify that I served a full, true and accurate copy of the foregoing document on the 31 January day of December, 2012, to the following named person:

Lee Pico
P.O. Box 703
Yellowstone National Park 82190
Hand delivered